

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT  
OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA

v.

No. 1:14-CR-306 - GBL

**MANUEL ERNESTO PAIZ GUEVARA,**  
Defendant

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO  
FILE EX PARTE**

DEFENDANT, MANUEL E. PAIZ GUEVARA has filed a Motion for Leave to file Ex Parte Amended Budget. Filing of Budget documents would, by necessity reveal the defense experts and members of the defense team, all of whom may be required to seek out facts and evidence to present the defendant's case. Revelation of the identity of these members of the defense team, providing assistance to the defendant and his attorneys could impede their ability to collect such information.

Further, public disclosure and identification of the experts and others assisting counsel in the investigation of the defendant, the facts of the case and trial matters would deny or diminish the defendant's right to effective assistance of counsel, reveal defense strategy and thwart or diminish defendant's right to attorney work product.

WHEREFORE, premises considered, defendant moves that he may be permitted to file his proposed and amended budget ex parte.

Respectfully submitted,

**MANUEL ERNESTO PAIZ GUEVARA**

By: \_\_\_\_\_/S/\_\_\_\_\_

David P. Baugh, Learned Counsel  
2025 East Main Street, Suite 108  
Richmond, Virginia 23223  
804.743.8111 dabaugh@dabaugh.com

W. Michael Chick, Jr.  
Law Offices of W. Michael Chick, Jr  
10513 Judicial Drive, Suite 102  
Fairfax, Virginia 22030 571.276.8279 mike@chicklawfirm.com  
ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned HEREBY CERTIFIES that the above and foregoing was electronically filed on July 29, 2015, with the Clerk of the Court using the CM/ECF system, to be served electronically upon counsel for all defendants and the Office of the United States Attorney for the Eastern District of Virginia, Alexandria Division.

/S/ David P. Baugh

David P. Baugh, Learned Counsel  
2025 East Main Street, Suite 108  
Richmond, Virginia 23223

804.743.8111 dpbaugh@dpbaugh.com

W. Michael Chick, Jr.  
Law Offices of W. Michael Chick, Jr  
10513 Judicial Drive, Suite 102  
Fairfax, Virginia 22030 571.276.8279 mike@chicklawfirm.com